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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

Crafty Productions, Inc., a California corporation, and CPI Productions, LLC, a California company, Plaintiffs, vs. Fuqing Sanxing Crafts Co. Ltd., a China company, Tony Zhu, an individual, Michelle Faherty d/b/a MRF Associates, an individual, The Michaels Companies, Inc., a Delaware corporation, Michaels Stores, Inc., a Delaware corporation, Plaid Enterprises, Inc., a Georgia corporation, Hobby Lobby Stores, Inc., an Oklahoma corporation, Sbars, Inc., a New Jersey corporation, A.C. Moore Arts & Crafts, Inc., a New Jersey corporation, 99 Cents Only Stores LLC, a California company, Dollar Tree Stores, Inc., a Virginia	Case No. 15-cv-00719-BAS-JLB Assigned to: Hon. Cynthia Bashant Courtroom No.: 4B 4TH Floor **DEFENDANT MICHELLE FAHERTY d/b/a MRF ASSOCIATES, INC.'S OPPOSITION TO PLAINTIFFS' *EX PARTE* APPLICATION REQUESTING ORAL ARGUMENT ON PENDING MOTIONS** (ECF 84-85 88-90 103-104) **Hearing: November 23, 2015** **NO ORAL ARGUMENT UNLESS REQUESTED BY THE COURT**

corporation, Jo-Ann Stores, LLC, an Ohio company, Party City Holdings, Inc., a Delaware corporation, Party City Corporation, a Delaware corporation, ZheJiang HongYe Co. Ltd., a China company, Fuzhou Bomy Trading Co., Ltd., a China company, Fuzhou Great Suns Co. Ltd., a China company, Sunface Crafts Co. Ltd., a China company, Defendants.	Complaint Filed: April 1, 2015 First Amended Complaint Filed: September 11, 2015 Trial Date: None

Defendant Michelle Faherty, d/b/a MRF Associates, Inc., ("Faherty") opposes Plaintiffs' Ex Parte Application, D.I. 134, requesting oral argument on the pending motions calendared for November 23, 2015.

Defendant Faherty respectfully disagrees that, at least with respect to Defendant Faherty's Motion to Dismiss for Lack of Personal Jurisdiction any of the reasons identified by Plaintiffs support the need for oral argument. The declarations supporting Flaherty's Motion confirm that Faherty lacks the requisite minimum contacts and Plaintiffs have not presented any relevant evidence that contradicts that finding.

Defendant Faherty also objects to any attempt by the Plaintiffs to introduce testimony by Ms. Paula Mello at the requested hearing. Ms. Mello has offered testimony through her declaration in support of Plaintiffs' opposition to the numerous Defendants' motions. It seems that the Plaintiffs are trying to supplement their papers by trying to seize the opportunity to offer live testimony in their request for oral argument. Plaintiffs had ample time to offer evidence and Ms. Mello's testimony through declaration to support their papers. Both sides had the opportunity

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to present the best evidence through their respective papers. An oral argument is not required.

Dated: November 19, 2015

REED & GIORDANO, P.A.

By: */s/ Philip M. Giordano*
Philip M. Giordano (Pro Hac Vice)
Siobhan M. Tolan (Pro Hac Vice)
Attorney for Defendant
Michelle Faherty d/b/a MRF
Associates, Inc.

Dated: November 19, 2015

HENNELLY & GROSSFELD LLP

By: /s/ Michael G. King
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CERTIFICATE OF SERVICE

I, Philip M. Giordano hereby certify that on this 19th day of November, 2015, I filed the foregoing using the CM/ECF system, which caused the foregoing to be served to all parties, by and through their counsel of record, on an electronic basis.

Executed on November 19, 2015, at Boston, Massachusetts

/s/ Philip M. Giordano